

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**FOURTH SUPPLEMENTAL DECLARATION OF  
JEFFREY S. BUCHOLTZ IN SUPPORT OF APPLICATION OF  
DEBTORS FOR AUTHORITY TO RETAIN AND EMPLOY  
KING & SPALDING LLP AS SPECIAL COUNSEL TO  
THE DEBTORS *NUNC PRO TUNC* TO THE PETITION DATE**

I, Jeffrey S. Bucholtz, hereby declare that the following statements are true and correct to the best of my knowledge after due inquiry as described herein:

1. I am a partner of the law firm of King & Spalding LLP (“**K&S**”), which maintains offices at 1700 Pennsylvania Avenue, NW, 2nd Floor, Washington, DC 20006-4707. I am an attorney admitted to practice law in the District of Columbia. There are no disciplinary proceedings pending against me.

2. I am familiar with the matters set forth herein and make this fourth supplemental declaration (the “**Fourth Supplemental Declaration**”) in connection with the *Application Of Debtors For Authority To Retain And Employ King & Spalding LLP As Special Counsel To The*

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

*Debtors Nunc Pro Tunc To The Petition Date* [ECF No. 427] (the “**Application**”)<sup>2</sup> filed on November 5, 2019, and my initial declaration attached as Exhibit B to the Application (the “**Initial Declaration**”).

3. As set forth in the Application, which was granted by this Court on November 25, 2019 [ECF No. 543] (“**Initial Retention Order**”), K&S committed to file a supplemental declaration pursuant to Bankruptcy Rule 2014 to the extent it discovers information that is relevant to the Application and merits disclosure. *See* Initial Declaration, ¶ 8. Accordingly, in connection with K&S’s representation of the Debtors as special counsel, I submit this Fourth Supplemental Declaration to provide the additional disclosures set forth herein.

#### **SPECIFIC DISCLOSURES**

4. As set forth in the Application and as approved pursuant to the Initial Retention Order, K&S was authorized to provide the K&S Services to the Debtors, which included, among others, the following services: (i) “assisting the Debtors in connection with investigations by the U.S. Department of Justice and investigations and claims by other entities in an effort to reach a global resolution;” (ii) “assisting the Debtors with responses to discovery-related requests from individual counsel and third parties;” (iii) “assisting the Debtors in the defense of privilege and work product issues relating to the opioid matters;” (iv) assisting the Debtors with discovery in connection with any stay issues or other matters relating to opioid claims in non-bankruptcy forums;” and (v) “such other specific services as may be requested by the Debtors from time to time relating to the identification, collection, processing, review and production of documents in

---

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

connection with the Debtors' opioid-related claims in these chapter 11 cases." Application, ¶ 8; Initial Declaration, ¶ 3.

5. As authorized by the Initial Retention Order, K&S has been representing and will continue to represent the Debtors in connection with efforts to reach a global resolution in these cases, as well as discovery matters that arose, or may arise, in connection with these cases. In this regard, certain issues concerning discovery matters and the Debtors' efforts to reach a global resolution in these cases have arisen in the adversary proceeding captioned *Purdue Pharma L.P., et al. v. AIG Specialty Ins. Co., et al.*, Adv. Proc. No. 21-07005 (RDD) (Bankr. S.D.N.Y.) (the "**Insurance Adversary**"). The Debtors, as well as certain of the Debtors' prior consultants, have been served with discovery requests in the Insurance Adversary. These consultants are: (i) McGinn & Company, (ii) Fenn Communications Group, and (iii) Strauss Media Strategies (collectively, the "**Consultants**"). K&S will represent the Debtors and the Consultants in connection with discovery matters that may arise in the Insurance Adversary in connection with these subpoenas. K&S believes these services fall within the K&S Services and are authorized by the Initial Retention Order. K&S is filing this Fourth Supplemental Declaration out of an abundance of caution to provide the supplemental disclosures set forth herein.

6. In light of the foregoing, and based upon the information available to me, K&S neither represents nor holds an interest adverse to the interests of the Debtors or their estates with respect to the matters on which K&S has been employed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief on this 21st day of April, 2022.

/s/ Jeffrey S. Bucholtz  
Jeffrey S. Bucholtz